

UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF PENNSYLVANIA

In re: Roxanne Lynne Herceg
Debtor

Case No. 17-21194 TPA
Chapter 13

JP Morgan Chase Bank, N.A.
Movant

v.

Roxanne Lynne Herceg, Ronda J.
Winnecour, Esq., Trustee
Respondents

DECLARATION OF DEBTOR IN RESPONSE TO
NOTICE OF MORTGAGE PAYMENT CHANGE

Debtor Roxanne Lynne Herceg, by her attorneys Catherine T. Martin and Neighborhood Legal Services Association, hereby states:

1. The debtor's plan dated March 28, 2017 includes the increase in mortgage payment to \$327.56.
2. The debtor does not object to the proposed mortgage payment change.
3. The debtor's plan, which was given an interim confirmation on April 27, 2017, is sufficient to fund the plan with the modified debt.

Respectfully submitted,

/s/Catherine T. Martin

Attorney for Debtor/Movant

Pa. I.D. #29049; Firm #213

NLSA, 928 Penn Avenue, Pittsburgh, PA 15222

(412) 586-6118; Email: martinc@nlsa.us

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CERTIFICATE OF SERVICE

I hereby certify that I have served a true and correct copy of the Debtor's Declaration in response to Notice of Mortgage Payment Change on the following individuals by Notice of Electronic Filing, on the date stated below:

James Warmbrodt on behalf of Creditor JPMORGAN CHASE BANK, NATIONAL
ASSOCIATION: bkgroup@kmlawgroup.com

Ronda J. Winnecour, Chapter 13 Trustee
cmecf@chapter13trusteewdpa.com

Office of the United States Trustee
ustpreion03.pi.ecf@usdoj.gov

And by first class mail to:

Ashley Hubbart
JP Morgan Chase Bank, NA
Chase Records Center; Attn: Correspondence Mail
Mail Code LA4-5555
700 Kansas Lane
Monroe, LA 71203

Date: 5/22/17

/s/ Catherine T. Martin
Pa. I.D. No. 29049; Firm No. 213
NEIGHBORHOOD LEGAL SERVICES
ASSOCIATION
928 Penn Avenue
Pittsburgh, PA 15222
(412) 586-6118; martinc@nlsa.us